Message

From: Rice, Scott [Rice.Scott@epa.gov]
Sent: 3/29/2017 1:08:35 PM
To: pizarro, luis [pizarro.luis@epa.gov]; Smith, Barbara [Smith.Barbara@epa.gov]
CC: Pratt, Stacie [Pratt.Stacie@epa.gov]
Subject: Momentive Soil Management Plan
Attachments: WWTU_Soil_Management_Plan_Momentive_2-03-17 (1).pdf

Good morning Luis, Barb. Attached is the soil management plan for the Momentive corrective action site in Sistersville, WV. The plan for removing PCB contaminated soil from the proposed location of the wastewater upgrade system has most of the elements of a PCB cleanup plan, however it is light on extent of contamination, and has no verification sampling built in. The lack of information regarding the extent of contamination is understandable, since there are many support buildings, clarifier systems, and overhead and subgrade utilities and piping systems that prevent comprehensive sampling in all directions to determine the extent of contamination. That being said, since they do not plan on "chasing" contamination outside of their construction zone footprint, those PCB issues, including PCB impacts to sediment and water outside the construction zone can be addressed at a later date.

I don't think it should take too long for Momentive to format the soil management plan into a PCB cleanup component of your corrective action permit. As I mentioned earlier, Momentive does not want to collect confirmation samples, since they will not be chasing contamination; they merely want to remove the soil that is necessary to accommodate construction in the waste water system upgrade, and they want to sample that waste to determine appropriate disposal facility, i.e. <50 ppm to a municipal waste landfill, and >50 to a TSCA approved landfill. I'll leave it up to you to determine if Momentive needs to take confirmation samples, since this isn't a PCB remediation per se, as opposed to a construction project in an area at a Corrective Action site that has PCB impacted soil. Since they don't plan on chasing PCBs, perhaps confirmation samples aren't necessary, or could be addressed at a later time as well. But it will be logistically hard to collect samples AFTER the system is put in to determine what was left behind.

Regarding what they might have to do at a later date would be determined by their pre/post 1978 finding. If they can determine that the soils were impacted pre 1978, then there is no impetus for them to conduct a PCB remediation to address the other areas of the site. However, the fact that the Statement of Basis identifies that sediment/water in the stream adjacent to the site HAS been impacted would imply, at least to me, that there may be migration occurring offsite, which would warrant additional investigation into potential onsite PCB sources.

Let me know what questions or additional information you might need. Otherwise I will talk with you at 1:00. Best regards